

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Mail Processing Network :
Rationalization Service : Docket No. N2012-1
Changes, 2012 :

GREETING CARD ASSOCIATION INTERROGATORY TO
POSTAL SERVICE WITNESS NERI

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, the Greeting Card Association herewith submits interrogatories and requests for production of documents; specifically:

Interrogatory to Postal Service witness Neri: GCA/USPS-T4-25

The term "documents" includes, without limitation, letters, telegrams, memoranda, reports, studies, articles from periodicals, speeches, testimonies, books, pamphlets, tabulations, and workpapers. In terms of format, "documents" includes written or printed records and disks, tapes, or other recorded media (together with such written material as is necessary to understand and use such disks, tapes, or other media). If necessary, an interrogatory may be redirected to another witness, or to the Postal Service, in the interest of a complete and accurate response.

February 24, 2012

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-T4-25

(a) Can you confirm that the Postal Service's original planned deployment of DBCS 7 equipment nationwide in FY 2011 in fact has happened? If "yes", please answer parts (b) and (c) below. If you do not confirm, please explain the current status of this deployment.

(b) In light of your acknowledgement of "considerable excess mail processing capacity" on page 2, lines 16-17, of your testimony, why would the Postal Service invest in equipment in which the capacity per machine is increased 30 percent?

(c) At FY2010 mail volumes, if DBCS 6 equipment was utilized only 25 percent of the time, please confirm that DBCS 7 equipment, ceteris paribus, would have a utilization rate even lower than 25 percent. If you do not confirm, please explain why.